

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

WOLLMUTH MAHER & DEUTSCH LLP

Paul R. DeFilippo, Esq.
500 Fifth Avenue
New York, New York 10110
Telephone: (212) 382-3300
Facsimile: (212) 382-0050
pdefilippo@wmd-law.com

JONES DAY

Gregory M. Gordon, Esq.
Brad B. Erens, Esq.
Dan B. Prieto, Esq.
Amanda Rush, Esq.
2727 N. Harwood Street
Dallas, Texas 75201
Telephone: (214) 220-3939
Facsimile: (214) 969-5100
gmgordon@jonesday.com
bberens@jonesday.com
dbprieto@jonesday.com
asrush@jonesday.com
(Admitted *pro hac vice*)

PROPOSED ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

APPLICATION FOR ORDER SHORTENING TIME

TO: THE HONORABLE MICHAEL B. KAPLAN
CHIEF UNITED STATES BANKRUPTCY JUDGE

The above-captioned debtor (the “Debtor”), by and through its undersigned counsel,
requests that the time period to notice a hearing on the *Debtor’s Motion for an Order*

(I) Scheduling Hearing on Approval of Disclosure Statement; (II) Establishing Disclosure

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

Statement Objection Deadline; and (III) Granting Related Relief (the “Motion”)² as required by D.N.J. LBR 9013-2(a) be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), for the reasons set forth below:

1. A shortened hearing time is requested because: The Debtor commenced this Chapter 11 Case to pursue confirmation of a plan of reorganization, the material terms of which have been agreed to with thousands of talc claimants and memorialized in a series of plan support agreements. Consistent with the terms of the plan support agreements, the Debtor is working diligently to finalize and file the Plan by May 14, 2023, or as soon thereafter as is feasible, together with the Disclosure Statement and a motion for approval of Solicitation Procedures.

2. Hearing the Motion on shortened notice, prior to the date by which the Debtor intends to file the Plan, the Disclosure Statement, and the Disclosure Statement Motion, will benefit parties in interest by establishing a schedule that will assist in the prompt resolution of this Chapter 11 Case. The Motion seeks to, among other things, schedule the Disclosure Statement Hearing and shorten the notice period for objections to approval of the Disclosure Statement by seven (7) days, from a twenty-eight day period to a twenty-one day period. An expedited confirmation process, including prompt consideration of the Disclosure Statement, is in the best interest of the Debtor, its creditors, and other stakeholders. Accordingly, the Debtor respectfully submits that it is necessary and appropriate for the Court to consider the Motion on shortened notice.

3. State the hearing dates requested: The Debtor respectfully requests that the Court hear the Motion on May 3, 2023, or on a date and time which is most convenient for the Court.

² Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

3. Reduction of the time period is not prohibited under Fed. R. Bankr. P 9006(c)(1).

The applicant requests entry of the proposed order shortening time.

Dated: April 19, 2023

WOLLMUTH MAHER & DEUTSCH LLP

/s/ Paul R. DeFilippo

Paul R. DeFilippo, Esq.

James N. Lawlor, Esq.

Joseph F. Pacelli, Esq. (Admitted *pro hac vice*)

500 Fifth Avenue

New York, New York 10110

Telephone: (212) 382-3300

Facsimile: (212) 382-0050

pdefilippo@wmd-law.com

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